

Fact Sheet



For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 31, 2012.

Permit Number: **R30-07100008-2012**
Application Received: **October 3, 2014**
Plant Identification Number: **07100008**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Seneca Compressor Station**
Mailing Address: **1700 MacCorkle Ave., SE, Charleston, WV 25314-1273**

Permit Action Number: *SM03* Revised: *Draft/Proposed*

Physical Location: Seneca Rocks, Pendleton County, West Virginia
UTM Coordinates: 639.50 km Easting • 4,301.10 km Northing • Zone 17
Directions: Traveling US Route 33 East from Elkins, turn left at the intersection with State Route 28 (Seneca Rocks). Proceed approximately 2 miles to the station which is located on the left.

Facility Description

The Seneca Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station currently consists of one (1) 13,750hp, two (2) 7,491hp, one (1) 1,557hp, and one (1) 15,432hp natural gas fired turbine engines, one (1) emergency generator, two (2) fuel gas heaters, one (1) liquids knockout system and fourteen (14) storage tanks of various sizes.

This modification incorporates the changes made in R13-2715E to remove synthetic minor limits on the Solar Turbines (E07) and (E08) based on a retroactive reclassification of Seneca Compressor Station as a minor source in 2013 prior to installation of these turbines. Since the source was actually minor prior to installation of the turbines, the synthetic minor limits placed on E07 and E08 were not required to classify the modification as a "minor modification".

The basis for this reclassification is an incorrect calculation of the facility-wide potential-to-emit (PTE) in Permit Application R13-2715C which calculated the (at the time existing, which have since been removed) grandfathered emergency generators G1 and G2's PTE as based on operating 8,760 hours per year. Per EPA guidance (September 6, 1995 memorandum authored by John Seitz), it would have been appropriate to calculate the PTE of the emergency generators (even in the absence of specific hours of operation limits in a permit) at 500 hours per year.

Emissions Summary

The change in potential emissions associated with the significant modification (SM03) is as follows:

Pollutants	Change in Potential Emissions, TPY
CO	+61.50
NO _x	+37.80
PM ₁₀	+1.20
SO ₂	+0.05
VOC	+2.96
Formaldehyde	+0.05

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 355.82 tons/yr of NO_x and 385.32 tons/yr of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2715E	March 5, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes from R13-2715E have been incorporated in the Title V permit. These changes include the following:

- The annual emission limits of E07 and E08 were decoupled and based on each unit operating 8,760 hours/year which was updated in condition 4.1.5 of R13-2715E.
- The annual fuel consumption limit of E07 was recalculated based on operating 8,760 hours per year and was changed in condition 4.1.7 of R13-2715E.
- The E07 and E08 operational flexibility language was removed from condition 4.3.8 as it was no longer necessary.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45CSR4 shall not apply to the following sources of objectionable odor until such time as feasible control methods are developed: Internal combustion engines.
[45CSR§4-7.1 State-Enforceable only.]
- b. 45CSR10; *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*-The two heating system boilers are not subject to 45CSR10 since the design heat input for each heating system boiler is less than 10 mmBtu/hr.
- c. 45CSR21; *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*- This facility is not located in one of the affected counties.
- d. 45CSR27; *To Prevent and Control the Emissions of Toxic Air Pollutants*- Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
- e. 40 C.F.R. Part 60 Subpart Dc; *Standards of Performance for Steam Generating Units*- The Seneca Compressor Station is not subject to 40 C.F.R. Part 60 Subpart Dc since the boilers at this facility are less than 10 mmBtu/hr.
- f. 40 C.F.R. Part 60 Subpart K; *Standards of Performance for Storage Vessels for Petroleum Liquids*- All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.
- g. 40 C.F.R. Part 60 Subpart Ka; *Standards of Performance for Storage Vessels for Petroleum Liquids*- All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.

- h. 40 C.F.R. Part 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels* - All tanks at Seneca station are below 75 m³ in capacity.
- i. 40 C.F.R. Part 60 Subpart GG; *Standards of Performance for Stationary Gas Turbines*- The four turbines (E05, E06, E07 and E08) at Seneca Compressor Station are not subject to Subpart GG since they are subject to 40 C.F.R. Part 60 Subpart KKKK. Turbine E04 was constructed prior to the applicability date of October 3, 1977.
- j. 40 C.F.R. Part 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant*- Seneca Compressor Station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both. Turbine E04 was constructed prior to the applicability date of October 3, 1977.
- k. 40 C.F.R. Part 63 Subpart HH; *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*- The Seneca Compressor Station is not subject to Subpart HH since Seneca Compressor Station is not a natural gas production facility.
- l. 40 C.F.R. Part 63 Subpart HHH; *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*- The Seneca Compressor Station is not a major source of HAPs and does not have a dehydration facility.
- m. 40 C.F.R. Part 63 Subpart YYYY; *National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* - Seneca Station is not subject to Subpart YYYY since it is not a major source of HAPs.
- n. 40 C.F.R. Part 64; *Compliance Assurance Monitoring*- The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.
- o. 40 C.F.R. 60 Subpart IIII; *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* - There are no compression ignition engines at the facility.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 19, 2015

Ending Date: April 20, 2015

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.